

# ELEVION GROUP ANTI-CORRUPTION MANAGEMENT SYSTEM POLICY

Anti-corruption Management System Policy is a part of the broader Compliance management system (CMS).

It is a set of tools and procedures designed to ensure an anti-bribery culture within the company and implement appropriate controls, which will in turn increase the chance of detecting bribery and reduce its incidence in the first place.

The purpose is to establish a system to prevent, detect, and respond to corruption within Elevion Group.

## Key insights:

- Establishment of Corporate Compliance Committee as advisory body to BoD of EGBV
- Employees must avoid situations where personal interests conflict with those of Elevion Group
- Any potential conflicts must be reported to the GRC department
- GRC department can investigate the reported incidents
- GRC department can carry out an internal audit within Elevion Group
- Disciplinary actions should be taken based on the severity of the misconduct
- Whistleblowing tool for reporting of unethical or illegal conduct is FaceUp – should be already implemented across the group
- Gifts policy contains instructions on how to proceed in potentially risky situations